

Philip Turner/R6/USEPA/US

09/23/2008 10:15 AM

To Bret Kendrick/R6/USEPA/US@EPA

cc

bcc

Subject (9087983) Fw_ TCE Action Level at Delfasco

----- Forwarded by Philip Turner/R6/USEPA/US on 09/23/2008 10:15 AM -----

Philip Turner/R6/USEPA/US

09/19/2008 02:53 PM

To "Mike Aplin" <MAplin@tceq.state.tx.us>

cc

Subject Re: Fw: TCE Action Level at Delfasco 

That's ok... I don't need to wait for Jon per se. We wrote our "policy" together.

Our position is fairly clear depending on the program. We have agreed to allowing short-term (e.g., removal) actions use the TCEQ value of 14 ug/m3 for clean-up. However, it is our "risk" policy and will likely be the remedial branch policy to use a value of 10 ug/m3 as the maximum long-term (e.g., remedial) clean-up value. Our screening value is 1.2 ug/m3. The 1.2 ug/m3 is based on Cal-EPA, and the 10 ug/m3 is the latest number proposed by extensive literature review as protective on non-cancer effects.

For clean-up values between 1.2 and 10 ug/m3, we do not yet have a formal policy, but all involved risk assessors (Superfund and RCRA) agree that there should be a tiered approach based on site specific factors.

I know all this sounds rather convoluted, and that is a long story, but we are fairly set on this probably until the EPA IRIS group accomplishes its assessment on TCE. If TCE follows the same trend as PCE, then all these values are likely to decrease significantly. But that is for another day...

Hope this helps!

Phil

"Mike Aplin" <MAplin@tceq.state.tx.us>



"Mike Aplin" <MAplin@tceq.state.tx.us>

To



09/19/2008 02:23 PM

Philip Turner/R6/USEPA/US@EPA

cc

Subject Re: Fw: TCE Action Level at Delfasco

Philip,

I haven't heard from Jon yet, but I saw that he was out of the office for several days. If you want to wait until you talk to him to get back to me, that's fine. We mostly wanted to get some feedback prior to the September 30th public meeting on Delfasco. We are also weighing our options on whether to pursue a noncarc inhalation toxicity factor for TCE, without a clear position from EPA.

Thanks,

Mike

>>> <Turner.Philip@epamail.epa.gov> 9/19/2008 1:46 PM >>>

Hi Mike,?

Have you heard from Jon Rauscher yet? If not, let me know and I will respond as best I can. I'm willing to bet you haven't heard from Jon... as he has either been on travel or tied up with Hurricane Ike stuff.

Thanks!

Phil

----- Forwarded by Philip Turner/R6/USEPA/US, on 09/19/2008 01:45 PM

Bret

Kendrick/R6/USEP

A/US To
"Mike Aplin"
09/16/2008 02:43 <MAplin@tceq.state.tx.us>
PM cc
Jon Rauscher/R6/USEPA/US@EPA,
Philip Turner/R6/USEPA/US@EPA
Subject
Re: TCE Action Level at Delfasco
(Document link: Philip Turner)

Mike,

Thanks for the e-mail. I am forwarding this to Philip Turner, one of our Superfund toxicologists working with Jon and other EPA toxicologists here in the Region on this issue. Jon is currently on travel and should return to the office on Thursday or Friday.

Thanks,

Bret Kendrick
Site Assessment Manager
Superfund Division
U.S. EPA, Region 6
Tel: (214) 665-2240
Fax: (214) 665-6660

"Mike Aplin"

<MAplin@tceq.state.tx.us>

To

Jon Rauscher/R6/USEPA/US@EPA

09/16/2008 01:52

cc

PM

Bret Kendrick/R6/USEPA/US@EPA

Subject

TCE Action Level at Delfasco

Jon,

TCEQ staff (Kip Haney-Toxicology, Diane Mazuca-Intergovernmental Relations, Pat Robards-Legal) and I had a conference call this morning with DSHS (Carrie Bradford, John Villannaci, Allie Archer), EPA (Beverly Negru?), and ATSDR (George Pettigrew, Jennifer Lyke) to throw around some ideas about a potential Texas Environmental Health Institute (TEHI) project in Grand Prairie. We (DSHS, ATSDR, TCEQ, EPA) are looking into doing some blood sampling for TCE and metabolites and correlating that data with indoor air sampling data (most likely via a contract with a

university). We were happy that all of our agencies were on the call together so we can coordinate our activities.

Beverly mentioned that there were only two homes sampled so far at the Delfasco TCE plume that exceeded the indoor air action level for TCE. She said that the RCRA action level would have included about 15 houses, but the CERCLA action level would only include two. So I asked what action level was being used at Delfasco. Interestingly, EPA said they were planning to use the TCEQ air number as an action level for the site. Could you clarify the specific target number (5 ug/m³ from NY, 12 ug/m³ from CalEPA, 14 ug/m³ from TCEQ, or some other number)?

We were thinking Region 6 was leaning toward the use of the NY noncarc number (5 ug/m³), so we had been evaluating our own value relative to the one from NY. In fact, we were leaning toward adopting the NY noncarc number in TRRP, which would then become the driver for air inhalation, lower than the noncarc number at 1×10^{-5} (14 ug/m³),.

I copied Bret Kendrick on this e-mail as well, since I understand he is managing the Delfasco site. Any feedback you can provide would be appreciated. At one time we had talked about having another conference call on TCE, so maybe we are ready to schedule that?

Thanks,
Mike Aplin
TCEQ - Toxicology Section
512-239-1792